

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

UNITED STATES OF AMERICA,

v.

Case No. 5:13-CR-16

FRANK WESLEY WADE

MOTION TO CONTINUE

CAME THIS DAY the defendant, Frank Wesley Wade, by counsel, and moved this Honorable Court to continue the March 8, 2022 hearing on this Court's March 1, 2022 Summons for Offender Under Supervision to a date convenient to the Court and the parties. As basis for this Motion, Mr. Wade, by counsel, states as follows:

- 1) Mr. Wade entered the Drug Treatment Court Program on August 17, 2021.
- 2) On February 24, 2021, Senior U.S. Probation Officer Angela George sought a summons for Mr. Wade to appear before this Court to respond to violation of the term of his supervision that he refrain from possession of a controlled substance.
- 3) On March 1, 2022, this Court issued a summons for Mr. Wade to appear on March 8, 2022, on the issue of revocation.
- 4) Mr. Wade subsequently retained counsel to represent him in this matter.

- 5) Having just entered a case with a substantial record, counsel cannot adequately prepare to assist Mr. Wade and has a previously scheduled case-related matter making him unavailable to appear on March 8, 2022.
- 6) Counsel is available on March 14, 16, 17, 24, and 25, as well as on April 7, 8, 12, and 13, 2022, should any of those dates be amenable to the Court and the parties.
- 7) Mr. Wade is in regular communication with Senior U.S. Probation Officer Angela George, as well as with Drug Court Probation Officer Dennis Gardner, and has met regularly with drug treatment providers at the Community Services Board in Harrisonburg.
- 8) Pursuant to direction from the Community Services Board, Mr. Wade has entered a course of drug treatment counseling at Crossroads Addiction Treatment Center, in Harrisonburg. Mr. Wade is employed and enrolled in training courses through his employer that he wishes to complete to continue providing for his family and maintaining mortgage payments on their home. Mr. Wade is amenable to further drug treatment services and would submit to electronic home monitoring or other terms to enable him to complete the Drug Treatment Court Program and continue working to provide for his family.

9) Counsel has been in contact with Ms. George and Mr. Gardner regarding possible drug treatment plans for Mr. Wade and has been informed that the Drug Treatment Court team will meet March 9, 2022, to discuss options for Mr. Wade.

WHEREFORE, Frank W. Wade, by counsel asks this Honorable Court to grant a continuance to a date in the coming month available to the Court and the parties.

Respectfully Submitted,

FRANK WESLEY WADE
By Counsel

/s/ Daniel H. Goldman
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Notice of Appearance was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter.

/s/ Daniel H. Goldman